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POSTAL REGULATORY  
COMMISSION

23 January 2020

Postal Regulatory Commission  
New York Avenue NW, Suite 200  
Washington, DC 202684001

RE: Docket Number: RM2017-3

Dear Commissioners:

I am writing on behalf of National Parks Conservation Association (NPCA) and our nearly 1.4 million members and supporters in response to your proposal as a part of the Ten-Year Rate Review process to remove the Consumer Price Index (CPI) cap that now governs postage rates. The new formula proposed represents potential volatile postage price hikes that range from 28% - 40% over the next five years. We strenuously oppose this action and strongly urge you to reconsider this decision.

NPCA, a 100-year-old organization, is the voice of America's national parks, working to protect and preserve our nation's most iconic and inspirational places for present and future generations. We celebrate the parks — and work tirelessly to defend them — whether on the ground, in the courtroom or on Capitol Hill. As a membership and advocacy organization, we are a nonprofit mailer; direct mail is a critical component of our fundraising program, responsible for 50 percent or more of our annual organizational revenue — revenue that makes it possible for us to carry out our work protecting imperiled national parks.

If the CPI capped rate making system were to change to the new proposed system the USPS has proposed, the consequences to our mission would be tangible. Having to spend significantly more on postage would mean we would have fewer resources for the communications, legal, lobbying, scientific research and grassroots work that our donors expect.

We believe the instability in postage costs also presents challenges in planning and budgeting. We have invested time and money to develop a mail fundraising program that meets current standards, is fiscally sound and is prepared for modest price increases. Annually, our organization spends more than \$2.5 million on postage. We have relied on the Postal Service's CPI capped rate increases to balance our fundraising budget and to plan for stability in the future. The sudden rate hikes that this rule change could represent would cripple our mailing programs.

In the short run, and most likely the long run, we would suffer substantial lost revenue and a consequential loss of resources for our programs. Unpredictable rate increases would lead to a further migration from mail to alternative – and less-effective – means of fundraising and membership engagement. In terms of our fundraising mix, hard-copy USPS mail remains efficient and effective as part of our multi-channel direct marketing strategy. Direct mail is a powerful fundraising tool, and we want to continue to utilize this tool in the future. We, like other nonprofit mailers, have long relied on our partnership with the Postal Service. We urge you to justify our reliance by declining to move this proposal any further.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Laura M. Connors', followed by a long horizontal line extending to the right.

Laura M. Connors  
Vice President of Membership  
National Parks Conservation Association